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May 4, 2018

VIA ECF AND FAX

The Honorable Anita B. Brody
United States District Court for the Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Room 7613
Philadelphia, Pennsylvania 19106-1751

**Re: *Thrivest Specialty Funding, LLC v. William White,*
No. 18-cv-1877 (E.D. Pa.) ("Thrivest v. White")**

***In Re: National Football League Players' Concussion Injury Litigation,*
No. 12-md-023230 (E.D. Pa.) (the "NFL Concussion Class Action")**

Dear Judge Brody:

I represent Thrivest Specialty Funding, LLC ("Thrivest") in the above-referenced matters presently pending before Your Honor.

Thrivest is the petitioner in Thrivest v. White, through which Thrivest seeks an order directing respondent William E. White ("White") to arbitrate a dispute in the arbitration captioned Thrivest Specialty Funding, LLC v. White, AAA No. 01-18-0001-4765 (the "Arbitration"). Attorney Robert Wood represents White in the Arbitration and has agreed to accept service of the Complaint in Thrivest v. White on White's behalf. Attorney Wood is copied on this correspondence.

Thrivest is a non-party to the NFL Concussion Class Action, through which Co-Lead Class Counsel seeks an injunction enjoining Thrivest from proceeding with the Arbitration or with any future arbitral, judicial or administrative proceeding against any Class Member arising out of Thrivest's agreements. Co-Lead Class Counsel in the NFL Concussion Class Action are copied on this correspondence.



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On May 2, 2018, Your Honor entered a temporary restraining order (Dkt. 9925), enjoining an emergency hearing in the Arbitration and scheduling a hearing for May 9, 2018 at 11:00 a.m. to determine whether to permanently enjoin the Arbitration. Among other things, that hearing will decide whether Thrivest can proceed with the Arbitration—which is the same issue presented by Thrivest's complaint to compel arbitration in Thrivest v. White, an issue which also requires a hearing.

For the convenience of the parties and to promote efficient resolution of the issues pending before Your Honor, Thrivest respectfully requests that the Court enter an order in Thrivest v. White, scheduling a hearing on Thrivest's complaint to compel arbitration that will be combined with the May 9, 2018 hearing in the NFL Concussion Class Action.

Thank you for consideration of this request.

Respectfully,

A handwritten signature in black ink that reads "Peter C. Buckley".

Peter C. Buckley

cc: Christopher Seeger, Esquire (via e-mail and ECF)
TerriAnne Benedetto, Esquire (via e-mail and ECF)
Robert Wood, Esquire (via e-mail)